

Joshua Lax  
Partner, Civil Rights Litigation  
Jlax@liakaslaw.com  
P: (212) 937-7765  
F: (877) 380-9432



Liakaslaw.com  
40 Wall Street  
50<sup>th</sup> Floor  
New York, NY 10005

New Jersey Office  
576 Main Street  
Suite C  
Chatham, NJ 07928

July 26, 2024

**VIA ECF**

Honorable Taryn A. Merkl  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**RE: Kapoor v. Michael Matthews Jewelers of Kings Plaza, LLC, et. al.,**  
**22 CV 5027 (HG)(TAM)**

Your Honor,

I write jointly with counsel for Defendants, Bhavleen Sabharwal, Esq., pursuant to the Court's July 9, 2024, Order directing the parties to submit a proposed schedule no later than July 26, 2024. The parties have conferred and propose the following schedule:

- Fact Discovery Complete: November 27, 2024
- Status Letter as to Whether Parties Need Expert Discovery: December 2, 2024
- Deadline for Any Party to File a Pre-motion Letter if No Expert Discovery: December 13, 2024;
- Deadline to Submit JPTO if no Pre-motion Letter is Filed: January 31, 2024.

Respectfully submitted,

/s/

Joshua J. Lax, Esq.

CC: All counsel (By ECF)